



DEPARTMENT OF
ECOLOGY
State of Washington

Draft Rule Implementation Plan

*Chapter 173-201A WAC Water Quality Standards
for Surface Waters of the State of Washington*

July 2018
Publication no. 18-10-029

Publication and Contact Information

This report is available on the Department of Ecology's website at <https://fortress.wa.gov/ecy/publications/SummaryPages/1810029.html>

For more information contact:

Water Quality Program

P.O. Box 47600

Olympia, WA 98504-7600

Phone: 360-407-6600

Washington State Department of Ecology - www.ecology.wa.gov

- Headquarters, Olympia 360-407-6000
- Northwest Regional Office, Bellevue 425-649-7000
- Southwest Regional Office, Olympia 360-407-6300
- Central Regional Office, Union Gap 509-575-2490
- Eastern Regional Office, Spokane 509-329-3400

To request ADA accommodation including materials in a format for the visually impaired, call Ecology at #360-407-7668 or visit <https://ecology.wa.gov/accessibility>. People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.

Draft Implementation Plan

*Chapter 173-201A WAC
Water Quality Standards for Surface Waters
of the State of Washington*

Water Quality Program
Washington State Department of Ecology
Olympia, Washington

This page purposely left blank.

Contents

Publication and Contact Information	i
Purpose	1
Introduction	1
Implementation and Enforcement	1
Implementing a Transition Period	1
Implementing changes to permits.....	3
Changes to specific permit related requirements	3
Implementing use changes to waters designated for secondary contact uses	4
Implementing changes to the minimum sample size requirements.....	4
Implementing new criteria in current and future Total Maximum Daily Loads (TMDLs)	5
Implementing the new criteria in the Water Quality Assessment	6
Informing and Educating Persons Affected by the Rule	7
Previous Outreach	7
Future Outreach	12
Promoting and Assisting Voluntary Compliance	12
Evaluating the Rule	13
Training and Informing Ecology Staff	14
List of Supporting Documents that May Need to be Written or Revised	15
More Information	15
Contact Information	16

This page purposely left blank

Purpose

The Washington State Department of Ecology (Ecology) provides the information in this draft implementation plan to meet agency and Administrative Procedure Act (RCW 34.05.328) requirements related to rule adoptions.

Introduction

On July 17, 2018, Ecology proposed amendments to Chapter 173-201A WAC Water Quality Standards for Surface Waters of the State of Washington (AO # 16-07). The purpose of this draft rule implementation plan is to inform those who must comply with Chapter 173-201A WAC about how Ecology intends to:

- Implement and enforce the rule
- Inform and educate persons affected by the rule
- Promote and assist voluntary compliance for the rule
- Evaluate the rule
- Train and inform Ecology staff about the new or amended rule

Also included in this plan is information about:

- Supporting documents that may need to be written or revised because of the new rule or amended rule
- Other resources where more information about the rule is available
- Contact information for Ecology employees who can answer questions about the rule implementation

Implementation and Enforcement

Implementing a Transition Period

The proposed water contact recreation use criteria rulemaking will require changing bacterial indicators for protecting water contact recreation activities. Several implementation actions will need to be considered to make an efficient transition from the current fecal coliform based criteria to the new criteria bacterial indicators. Therefore, Ecology has determined that a transition period is needed to implement the new criteria. This 2-year proposed period (ending December 31, 2020) will allow compliance monitoring to use the current fecal coliform standards or the new bacterial indicator standards where necessary for transition purposes. This

period will also allow laboratories time to transition to new sample analysis. See the “Promoting and Assisting Voluntary Compliance” section’s discussion on enforcement of the proposed rule.

How this meets the needs of permit compliance and monitoring programs

Effluent requirements in permits may need to change from those based on fecal coliform to new requirements based on *E. coli* and/or enterococci. For those permittees that discharge directly to marine waters or to rivers that are upstream of marine shellfish harvesting uses, both fecal coliform and enterococci monitoring will need to be considered.

To determine any future treatment technologies necessary to meet the new bacteria water contact recreation use criteria based on *E. coli* and enterococci, additional data may be needed. This period allows for concurrent monitoring of multiple indicators if necessary to set future permit requirements when the use of fecal coliform sunsets.

Monitoring programs conducted by Ecology, other agencies, and tribes will also need this transition time to change bacterial indicators. Several monitoring programs may opt to use this transition time to perform dual concurrent monitoring to ensure that long-term datasets are comparable over time. This may help to establish site-specific relationships between fecal coliform and the new indicator to ensure trend information can be inferred from a more robust and complete time series of data.

How this meets the needs of laboratories that perform bacteria analysis

A transition period is also important for allowing time for accrediting the laboratories of permitted dischargers that conduct in-house laboratory testing for bacteria. There are approximately 188 wastewater treatment plants accredited for in-house fecal coliform analysis. Treatment plants currently accredited for fecal coliform will need to undergo accreditation for new bacterial indicators and, potentially, new microbial test methods. Ecology’s accreditation unit current has one microbiologist that accredits laboratories for bacteria. The accreditation unit prioritizes drinking water audits over environmental monitoring. The accreditation unit does not have the capacity to immediately accredit laboratories for a new indicator and anticipates accreditation to be a multi-year effort. The transition period provides a window of time for laboratories to become accredited for the new bacterial indicators.

The transition period is intended to provide time for permittees to purchase new equipment, incorporate new laboratory methods, conduct training, and become accredited for the new bacterial indicators and methods.

Implementing changes to permits

Schedule for modifying permits with water quality based effluent limits (WQBELs)

Ecology will modify National Pollutant Discharge Elimination System (NPDES) permits to reflect updated water quality standards during their regular 5-year renewal process. Between the period immediately following adoption of the water contact recreation use criteria rule and December 31, 2020, both the current fecal coliform criteria and the new updated water contact recreation use criteria will be available for permit compliance.

Permits renewed between the rule adoption date and December 31, 2020, may include a statement within the permit that indicates the time during the 5-year permit that the new bacterial indicator and associated effluent limits become applicable and when the fecal coliform limits end. Ecology encourages the collection of monitoring data on the new bacterial indicators during the transition period. This data serve to develop new permit effluent limits and to determine attainment of contact recreational uses criteria during permit renewals.

Changes to specific permit related requirements

The following provides further detail of different permitting requirement scenarios, and how Ecology is planning to address these during the 2-year transition period.

Permits with fecal coliform water quality based effluent limits (WQBELs) for the protection of recreational uses

Permits with fecal coliform WQBELs based on water contact recreation uses will be required to transition to the updated water contact recreation criteria by December 31, 2020. Permits renewed between the rule adoption date and December 31, 2020, may include a statement within the permit that indicates the time during the 5-year permit that the new bacterial indicator and associated effluent limits become applicable and when the fecal coliform limits end.

Permits with fecal coliform WQBELs for the protection of downstream shellfish harvesting uses

Permits with fecal coliform WQBELs based on downstream shellfish harvesting uses will continue to monitor fecal coliform to ensure protection of the shellfish harvesting use. Permits associated with impaired waters with downstream shellfish harvesting uses will continue to receive allocations for fecal coliform.

Permits with fecal coliform WQBELs based on the protection of recreation and shellfish harvesting uses

Permits with fecal coliform WQBELs based on the protection of both water contact recreation and shellfish harvesting uses (that is, all marine waters in the proposed rule) should monitor for both the water contact recreation use bacterial indicator and the shellfish harvesting-based fecal

coliform indicator. After collecting sufficient data on both water contact recreation and shellfish harvesting-based bacterial indicators, Ecology may determine to require only one bacterial indicator is necessary. In marine waters, side-by-side data comparing water contact recreation criteria or shellfish harvesting bacterial indicator sample values may be used to determine the more stringent criteria. The Ecology permit writer will maintain the discretion to require both bacterial indicator monitor for the protection water contact recreation use and shellfish harvesting use. However, when effectual, the permit writer may choose limit the compliance monitoring to demonstrate compliance with only the more stringent criteria.

Permits with fecal coliform technology-based effluent limits (TBELs)

Permits that employ technology based limits will continue to use fecal coliform based limits until a future rulemaking updates the bacterial indicator and numeric criteria. Concurrent monitoring of the new bacterial indicator will be recommended for some dischargers to ensure future attainment of compliance requirements.

Implementing use changes to waters designated for secondary contact uses to primary contact uses

The current water contact recreation criteria include enterococci as the bacterial indicator for marine waters designated for secondary contact uses. The geometric mean criterion is 70 CFU/100 mL. Waters designated for secondary contact uses will be moved to primary contact uses, and will be required to meet enterococci levels of 30 CFU/100 mL for this higher protection level. Fresh waters designated with secondary contact uses will move from a fecal coliform limit of 200 colonies/100 mL to the primary contact use of *E. coli* at 100 CFU or MPN/100 mL.

Implementing changes to the minimum sample size requirements within the averaging period

There is currently no required minimum sample size to calculate a geometric mean for comparison to the bacteria criterion. However, the current recreational criteria states that it is *preferable* to have 5 or more sample collection events for averaging sample data. The proposed rule will now require a minimum of 3 sample values within the averaging period to calculate the geometric mean for comparison to the geometric mean criteria. Permit writers should require weekly sampling to collect an adequate number of samples to compare to the geometric mean. The STV (or 10% not-to-exceed value) may continue to be used as a single sample maximum in permits when sample sizes are less than 10 samples per averaging period.

Implementing new criteria in current and future Total Maximum Daily Loads (TMDLs)

The Environmental Protection Agency (EPA) has approved 46 Total Maximum Daily Load (TMDL) projects based on fecal coliform in Washington State. These TMDLs consist of 582 waterbody segments for which load allocations have been set based on fecal coliform reductions. In the proposed rule, fecal coliform will be phased out as an indicator for purposes of compliance with water contact recreation use criteria. Nonetheless, the EPA approved these waterbody segments and associated cleanup implementation plans based on fecal coliform target reductions.

Ecology proposes that Ecology staff developing fecal coliform TMDLs work with the local watershed stakeholders and the EPA to determine which of the indicators is most appropriate for determining effectiveness of the cleanup actions. In some cases, such as in those marine waters for which the TMDL project addresses the protection of both recreational uses and shellfish harvesting uses, fecal coliform will remain the indicator for future monitoring.

Marine TMDL waterbody segments

TMDLs set for shellfish harvesting uses.

TMDL cleanup goals for marine waters are set to meet fecal coliform criteria that are protective of the shellfish harvesting use. The shellfish harvesting criteria will not change in the proposed rule. Therefore, TMDL implementation and effectiveness monitoring will continue with the fecal coliform indicator. Fecal coliform-based TMDLs with pollutant load allocations based on shellfish harvesting uses will continue to monitor for fecal coliform.

Fresh water TMDL waterbody segments

TMDLs set for recreation uses.

Fecal coliform TMDLs with allocations based on water contact recreation uses currently monitor for fecal coliform. TMDLs in upland rivers and lakes that do not have impacts to downstream marine uses may be reviewed to consider *E. coli* for future compliance monitoring to reflect the updated contact recreation criteria. Although the EPA approved these TMDLs on the basis of fecal coliform reductions, the ultimate measure of effectiveness of TMDL implementation is the determination that contact recreation uses are fully protected. When the fecal coliform indicator is phased out of the water quality standards, *E. coli* will remain as the sole numeric criteria for determining that this use is met. Ecology will work with the EPA and local watershed stakeholders to determine the appropriate time to change to the *E. coli* indicator. Dual parameter monitoring of fecal coliform and the updated bacterial indicator may be needed to determine attainment of water contact recreation uses.

TMDLs set for recreation and downstream shellfish harvesting uses.

Fecal coliform-based TMDLs have pollutant reduction targets set to meet both contact recreation and shellfish harvesting uses. Most of the TMDL fecal coliform targets in the lower portion of watersheds that flow directly to marine waters must maintain the fecal coliform indicator to ensure protection of downstream shellfish harvesting use. Dual parameter monitoring of bacterial indicators representing recreational criteria and those of shellfish harvesting criteria may be needed to determine attainment of recreational and shellfish harvesting uses.

Implementing the new criteria in the Water Quality Assessment (303d/305b Integrated Report)

Ecology is currently in the middle of a Water Quality Assessment cycle. After an extensive public process, updates to Policy 1-11 are expected to be finalized in summer 2018, based on the fecal coliform criteria that were in place at the time the updates to Policy 1-11 were developed. After Policy 1-11 updates are finalized, Ecology will begin the technical assessment of water quality data. Ecology anticipates that the proposed rule will be adopted before the Water Quality Assessment is completed in 2019. Both fecal coliform and *E. coli* criteria will be in place in the standards after the proposed rule is adopted. The fecal coliform criteria have a proposed sunset date of December 31, 2020. Therefore, for the Assessment currently underway, Ecology will assess both fecal coliform and *E. coli* using the assessment methodology described in final updates to Policy 1-11.

After the proposed rule is adopted and the current Water Quality Assessment is completed, the water quality assessment listing policy (Policy 1-11) may be updated in consideration of the magnitude, duration, and frequency changes to the contact recreation criteria. Potential future updates to Policy 1-11 may include the assessment period duration, sample size requirements, and bacterial indicators used to determine impaired waters.

Informing and Educating Persons Affected by the Rule

Previous Outreach

During the CR-101 phase of this rulemaking, Ecology reached out to entities to answer questions and discuss the implications of the revisions to the recreational use criteria. Below is a list of organizations that Ecology contacted during the CR-101 phase:

OUTREACH METHODS (emails, meetings, notices)	SMALL BUSINESS INVOLVEMENT (business or association names)	LOCAL GOVERNMENT INVOLVEMENT (local government name)
Water Quality Information Listserv	Voluntary membership to stay informed on the recreational use criteria rulemaking.	Voluntary membership to stay informed on the recreational use criteria rulemaking.
Emails Soliciting for Technical Team Participants	Northwest Pulp and Paper, Taylor Shellfish, Pacific Coast Shellfish Growers Association, Association of Washington Business, Washington Environmental Council, Northwest Environmental Advocates, Columbia Riverkeepers, Puget Sound Keeper Alliance, Center for Justice,	Thurston County, Association of Counties, Tacoma-Pierce County, Association of Cities, Washington Conservation Districts, Washington Department of Health, City of Centralia, CRITFC, NWIFC, tribes.
Technical Advisory Team (Meeting 1)	Association of Washington Business, Washington Environmental Council, Washington Farm Bureau	Tacoma-Pierce County, Jefferson County, Chelan PUD, Kitsap County, King County, City of Centralia, King County, Kalispel Tribe, Port Gamble S'Klallam Tribe, Whatcom Conservation District, Environmental

OUTREACH METHODS (emails, meetings, notices)	SMALL BUSINESS INVOLVEMENT (business or association names)	LOCAL GOVERNMENT INVOLVEMENT (local government name)
		Protection Agency, Washington Department of Health, City of Seattle, Washington Department of Ecology.
Technical Advisory Team (Meeting 2)	Association of Washington Business, Washington Environmental Council, Washington Farm Bureau	Tacoma-Pierce County, Jefferson County, Chelan PUD, Kitsap County, King County, City of Centralia, King County, Kalispel Tribe, Port Game S'Klallam Tribe, Whatcom Conservation District, Environmental Protection Agency, Washington Department of Health, City of Seattle, Washington Department of Ecology.
Technical Advisory Team (Meeting 3)	Association of Washington Business, Washington Environmental Council, Washington Farm Bureau	Tacoma-Pierce County, Jefferson County, Chelan PUD, Kitsap County, King County, City of Centralia, King County, Kalispel Tribe, Port Game S'Klallam Tribe, Whatcom Conservation District, Environmental Protection Agency, Washington Department of Health, City of Seattle, Washington Department of Ecology.

OUTREACH METHODS (emails, meetings, notices)	SMALL BUSINESS INVOLVEMENT (business or association names)	LOCAL GOVERNMENT INVOLVEMENT (local government name)
Kick-off Recreational Use Criteria Webinar	Exxon Mobil, Boeing, AECOM, Sonoco, Comcast, Geosyntec, Miles Sand and Gravel Company, Association of Washington Business, Brown Caldwell, Brooks Manufacturing, Washington State Water Resources Association, Otak, LOTT Clean Water Alliance, Woodward Environmental.	Pierce County, City of Bainbridge, WA Department of Natural Resources, Skokomish Tribe, Snohomish County, City of Camas, Washington State Recreation and Conservation Office, Washington Department of Ecology, Kitsap County, Jefferson County, City of Spokane, Cowlitz PUD, Environmental Protection Agency, Department of Interior Bureau of Reclamation, City of Port Orchard, City of Seattle, Kalispel Tribe, King County, Washington State University, Spokane Regional Health District, City of Maple Valley, Washington Department of Transportation, Pierce Conservation District, City of Everett, Port of Anacortes, City of Kirkland, City of Bellingham.
Coalition for Clean Water Presentation	Lakehaven Water and Sewer District, LOTT Clean Water Alliance.	City of Tacoma, City of Lynnwood, City of Seattle, City of Bremerton, City of Vancouver, City of Everett, Tacoma-Pierce County,

OUTREACH METHODS (emails, meetings, notices)	SMALL BUSINESS INVOLVEMENT (business or association names)	LOCAL GOVERNMENT INVOLVEMENT (local government name)
		Spokane County, City of Spokane.
Annual BEACH Program Meeting Presentation		Washington Department of Ecology, Swinomish Tribe, Tacoma-Pierce County Health Department, Snohomish County, Kitsap Public Health District, Mason County Public Health, Stillaguamish Tribe, Island County, Jefferson County, Grays Harbor County, Thurston County, Whatcom County, Port Townsend Marine Science Center, Clallam County, Oregon Department of Environmental Quality, Makah Tribe.
2018 Salish Sea Conference Presentation	Various	Various
Agriculture Committee	Northwest Chicken Council, Washington State Farm Bureau, Washington State Potato Commission, Washington Cattle Feeders Association, Washington State Tree Fruit Association, Center for Environmental Law and Policy, Taylor Shellfish, Capitol Press, and	Whatcom Conservation District, Environmental Protection Agency Region 10, Northwest Indian Fisheries Commission, and Washington Department of Agriculture.

OUTREACH METHODS (emails, meetings, notices)	SMALL BUSINESS INVOLVEMENT (business or association names)	LOCAL GOVERNMENT INVOLVEMENT (local government name)
	National Association of Wheat Growers.	
Internal Ecology Meetings		Washington Department of Ecology: TMDL group, permit group, freshwater ambient monitoring group.
Preliminary Rule Decision Webinar	Registrants: Washington Environmental Council, Boeing, IDEXX, Resources for Sustainable Communities, Teck American Incorporated, Brooks Manufacturing Company, Brooks Manufacturing Company, Andeavor, Inquisitio Scientia, Jacobs Engineering, Lott Clean Water LLC, Northwest Seaport Alliance, Sonoco, Northwest Pulp and Paper, Herrera Environmental Consultants, Puget Sound River Keepers, Hart Crowser, Olympic Environmental Council.	Registrants: Snohomish County, Washington Department of Ecology, King County, Stillaguamish Tribe, City of Camas, Thurston County, Washington State Recreation and Conservation Office, Kitsap County, City of Spokane, Whatcom Conservation District, City of Everett, Yakima/Klickitat Fisheries Project, Upper Skagit Tribe, Skagit County, Grant County PUD, City of Port Orchard, Washington Department of Health, Washington Department of Agriculture, Liberty Lake Sewer and Water District, City of Richland, Jamestown Tribe, Quincy-Columbia Basin Irrigation District, Washington Legislature, Capital Regional District, Pierce County, South-Columbia Basin Irrigation District, Brooks

OUTREACH METHODS (emails, meetings, notices)	SMALL BUSINESS INVOLVEMENT (business or association names)	LOCAL GOVERNMENT INVOLVEMENT (local government name)
		Manufacturing Company, City of Federal Way, Lower Elwha Klallam Tribe, Washington State University, City of Centralia, Pierce Conservation District, Quileute Tribe, City of Seattle, Skokomish Tribe, City of Vancouver, Port of Anacortes, Washington State Conservation Commission, Jefferson County, NWIFC.

Future Outreach

During the rule proposal (CR-102) phase, Ecology will hold five public hearings throughout the state to discuss the proposed water contact recreation criteria rule and collect formal comments. Ecology will formally respond to all comments received during the CR-102 phase.

After the rule is adopted, Ecology intends to inform and educate persons affected by the rule by:

- Providing continued opportunities to meet and discuss the implementation of the water contact recreation criteria rule with stakeholders, permit writers, laboratory technicians, and TMDL personnel as requested
- Developing and updating guidance documents, including the Permit Writer’s Manual
- Educating Ecology staff on how best to implement the rule in their Clean Water Act action work, including TMDLs and permitting.

Promoting and Assisting Voluntary Compliance

The proposed water contact recreation use criteria rule requires changing bacterial indicators for protecting recreational activities that come into contact with water. Given that Ecology is proposing a new water contact recreation criteria parameter, several implementation steps will need to be followed to make the transition from the current fecal coliform-based criteria to the new criteria.

If Ecology were to immediately enforce the proposed water contact recreation criteria, dischargers whose permit cycle ends near adoption of new criteria may be out of compliance, and subject to enforcement actions. To ease the transition and collect adequate data to develop accurate effluent limits that are protective of water contact recreation, a transition period is necessary. Effluent limits in permits will need to be changed from one based on fecal coliform to one based on *E. coli* and/or enterococci. The mixing zone and downstream shellfish harvesting uses will need to be considered when developing revised effluent limits. To meet proposed water contact recreation use criteria based on *E. coli* and enterococci, additional data may be needed along with modifications to operations and treatment technologies for pathogens.

A transition period is essential for accrediting laboratories for permitted dischargers that conduct in-house laboratory testing for bacteria. There are approximately 188 wastewater treatment plants accredited for fecal coliform. If the water quality standards no longer included fecal coliform based criteria, the treatment plants accredited for fecal coliform would need to become accredited for the proposed bacterial indicator. Ecology's accreditation unit currently has one microbiologist that accredits laboratories for bacteria. The accreditation unit prioritizes drinking water audits over environmental monitoring. The accreditation unit does not have the capacity to immediately accredit laboratories for a new indicator and anticipates accreditation to be a multi-year effort.

The proposed water contact recreation use criteria will include both the fecal coliform-based criteria and the new criteria for a two-year period. This transition period will allow dischargers and environmental monitoring staff to collect side-by-side data on the new indicators and adjust treatment technologies. Ecology proposes a sunset date of December 31, 2020, after which time all compliance monitoring for the protection of water contact recreation use would need to meet the new bacteria indicator criteria.

Evaluating the Rule

Ecology is required to report on progress made implementing the water quality standards through our 303(d) reporting requirements to the EPA. We will evaluate proper implementation of the rule by identifying waters that are meeting these criteria, not meeting these criteria, or are scheduled for a TMDL.

The purpose of the surface water quality standards is to restore and maintain the chemical, physical, and biological integrity of Washington's waters. More specifically, the water quality standards are designed to protect public health, public recreation in the waters, and the propagation of fish, shellfish, and wildlife. The numeric and narrative criteria in the water quality standards are intended to protect those beneficial uses.

Ecology will consider the proposed changes to have achieved their purpose if they fully protect the beneficial uses. The water quality standards should also protect those beneficial uses in the least burdensome way.

Interim milestones: The two year transition period from fecal coliform to the proposed water contact recreation criteria will allow additional monitoring to be performed that can be used to make decisions on the appropriate indicator for both permitting and TMDLs.

Objectively measurable outcome: Outcomes of the rule can be measured if water quality standards are attained. Ecology monitors surface waters across the state to determine whether designated uses are being met. Monitoring data (meeting requirements of the Data Quality Act; RCW 90-48-570 to 90-48-590) will be used to determine whether designated uses are met.

Training and Informing Ecology Staff

A rulemaking of this magnitude requires broad outreach to Ecology permit writers, staff, and management involved with water quality regulation. This will be done through meetings, email communication, written guidance, and one-on-one communication. After adoption of the proposed rule, Ecology will notify all Ecology staff who use the criteria or tools. Ecology will also notify all Ecology staff after the EPA has finished its Clean Water Act (CWA) review of the adopted standards. The EPA is required to review and approve new rule language before use for CWA actions.

Below are examples of staff resources to address training and information sharing related to the proposed rule:

NPDES permits and 401 certifications: The Water Quality Program will provide training for the Ecology permit writers on changes to the rule and to permit writer's guidance. In addition, permit writers are given the opportunity to review and comment on changes to Ecology's Water Quality Program Permit Writer's Manual, which will contain the new guidance on how to implement the final rule changes. Permit writing tools and templates and forms will be updated to account for provisions in the final rule, and permit writers will be notified of changes. Most changes to the guidance discussed here would need approval from the program management team represented by both regional and headquarters management. Thus, the permit writing staff will also receive reinforcement from their local management regarding use of new guidance. Ecology's Permit Writer's Workgroup, made up of permit writers who meet quarterly to discuss emerging issues and facilitate communication throughout the regions and across other programs with staff who issue permits, provides ongoing support.

Water Quality Assessment: The staff working with the Water Quality Assessment will be involved in determining any new approaches that are needed in order to assess Washington waters for compliance with the final new contact recreation criteria.

Total maximum daily loads: Ecology's regional TMDL staff will be informed of changes to the standards through TMDL implementation workshops and Water Quality Program Permit Writer's Manual notifications.

Additional training on implementation of the revised water quality standards will be provided to Ecology staff upon request.

List of Supporting Documents that May Need to be Written or Revised

Ecology may write or revise the following list documents because of the proposed rule:

- Technology based limits
- Freshwater monitoring program protocols
- Water quality standards
- NPDES permits
- Compliance schedules
- Water quality assessment and the 303(d) listing policy (Policy 1-11)

More Information

The following websites contain more rule related information:

- **Water quality standards website:** <https://ecology.wa.gov/Water-Shorelines/Water-quality/Freshwater/Surface-water-quality-standards>
- **Water quality standards water contact recreation use rulemaking website:** <https://ecology.wa.gov/Regulations-Permits/Laws-rules-rulemaking/Rulemaking/WAC-173-201A-Aug17>

Contact Information

For more information about this draft rule implementation plan, please contact:

Bryson Finch – Technical Lead

300 Desmond Drive SE

Lacey, WA 98504

360-407-7158

bryson.finch461@ecy.wa.gov

Chad Brown – Water Quality Management Unit Supervisor

300 Desmond Drive SE

Lacey, WA 98504

360-407-6128

chad.brown@ecy.wa.gov